

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

SUPERSEDING INDICTMENT

v.

Case No. 22-cr-00080-wmc
18 U.S.C. § 1201(a)(1)
18 U.S.C. § 2
18 U.S.C. § 1201(c)

GERARDO HERNANDEZ ANSELMO,
FELIPE ENGRACIA-GONZALEZ, and
ABASITA ENGRACIA-GONZALEZ,

Defendants.

SEALED

THE GRAND JURY CHARGES:

COUNT 1

On or about June 9, 2022, in the Western District of Wisconsin and elsewhere, the
defendants,

GERARDO HERNANDEZ ANSELMO,
FELIPE ENGRACIA-GONZALEZ, and
ABASITA ENGRACIA-GONZALEZ,

knowingly and unlawfully seized, confined, kidnapped, abducted, and carried away
the victim, R.E., and held him for ransom or reward or otherwise, and in committing
the offense, willfully transported the victim in interstate commerce from Wisconsin to
Florida.

(In violation of Title 18, United States Code, Sections 1201(a)(1) and 2).

COUNT 2

From in or about December 2021, to on or about June 9, 2022, in the Western
District of Wisconsin and elsewhere, the defendants,

GERARDO HERNANDEZ ANSELMO,
FELIPE ENGRACIA-GONZALEZ, and
ABASITA ENGRACIA-GONZALEZ,

knowingly and unlawfully conspired with each other to seize, confine, kidnap, abduct, and carry away the victim, R.E., and hold him for ransom or reward or otherwise, and in committing the offense, willfully transported the victim in interstate commerce from Wisconsin to Florida.

Overt Acts

As part of this conspiracy and to effect its object, the defendants committed the following overt acts:

1. Defendants GERARDO HERNANDEZ ANSELMO and FELIPE ENGRACIA-GONZALEZ traveled from Florida to Wisconsin;
2. Defendant ABASITA ENGRACIA-GONZALEZ sent messages to defendants GERARDO HERNANDEZ ANSELMO and FELIPE ENGRACIA-GONZALEZ with suggestions regarding R.E.'s possible location in Wisconsin and instructions to facilitate taking R.E.;
3. Defendant FELIPE ENGRACIA-GONZALEZ threw R.E.'s phone out of a car window while R.E. was attempting to call 911; and
4. Defendants GERARDO HERNANDEZ ANSELMO and FELIPE ENGRACIA-GONZALEZ transported R.E. to Florida against his will.

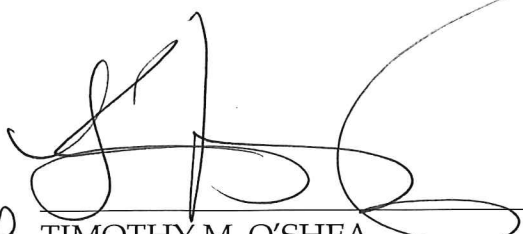
(In violation of Title 18, United States Code, Section 1201(c)).

A TRUE BILL



PRESIDING JUROR

Indictment returned: 12/21/2022



TIMOTHY M. O'SHEA
United States Attorney